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*Attorneys for Lior Dagan as Foreign Representative of  
Michael David Greenfield (a.k.a. Michael Ben-Ari)*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re:*

MICHAEL DAVID GREENFIELD  
*a.k.a.* MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**NOTICE OF MOTION OF LIOR DAGAN, THE FOREIGN REPRESENTATIVE, FOR  
ENTRY OF AN ORDER AFFIRMING HIS AUTHORITY TO REALIZE AND TAKE  
CONTROL OF CERTAIN IDENTIFIED ASSETS OF THE DEBTOR AND ASSETS OF  
THE DEBTOR THAT MAY BE IDENTIFIED IN THE FUTURE WITHIN THE UNITED  
STATES AND REPATRIATE THOSE ASSETS TO ISRAEL**

**PLEASE TAKE NOTICE** that Lior Dagan, in his capacity as the authorized foreign representative (“Foreign Representative”) of the above-captioned debtor (“Debtor”), filed the Foreign Representative’s Motion for Entry of an Order Authorizing the Repatriation of Assets to Israel (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion must be in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York, be filed by **March 28, 2022 at 4:00 p.m. (Prevailing Eastern Time)**, and shall be served on counsel to the Foreign Representative, Seiden Law Group LLP, 322 Eighth Avenue, Suite 1704, New York, NY 10001, Attn: Amiad Kushner, Esq., Jake Nachmani, Esq., and Dov B. Gold, Esq.

Additionally, a courtesy copy shall be delivered to the chambers of the Honorable Shelley C. Chapman.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing to consider such Motion and any objections related thereto (the “Hearing”) will be held on April 4, 2022, **at 10:00 a.m. (Prevailing Eastern Time)** before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004.

**PLEASE TAKE FURTHER NOTICE** that in accordance with General Order M-543, dated March 20, 2020 (“General Order M-543”),<sup>1</sup> the Hearing will be conducted telephonically. Any parties wishing to participate must do so telephonically by making arrangements through CourtSolutions LLC ([www.court-solutions.com](http://www.court-solutions.com)). Instructions to register for CourtSolutions LLC are attached to General Order M-543.

**PLEASE TAKE FURTHER NOTICE THAT** if no objections are timely filed and served with respect to the Motion, the Foreign Representative may, on or after the objection deadline set forth herein, submit to the Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered without further notice or opportunity to be heard.

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<sup>1</sup> A copy of the General Order M-543 may be obtained by visiting [www.nysb.uscourts.gov/news/general-order-m-543-court-operations-under-exigent-circumstances-created-covid-19](http://www.nysb.uscourts.gov/news/general-order-m-543-court-operations-under-exigent-circumstances-created-covid-19).

Dated: March 9, 2022  
New York, New York

SEIDEN LAW GROUP LLP

/s/ Amiad Kushner

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